Canadian Petroleum Association Submission on Northern Wilderness Parks

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on Northern Wilderness Parks

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CANADIAN PETROLEUM ASSOCIATION
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CANADIAN PETROLEUM ASSOCIATION

SUBMISSION ON

NORTHERN WILDERNESS PARKS

PRESENTED TO

THE HONOURABLE J. HUGH FAULKNER

MINISTER OF INDIAN AND NORTHERN AFFAIRS

CALGARY, ALBERTA

DECEMBER 1978

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The purpose of this brief is to set out the views of the Canadian Petroleum Association concerning the need for consultation, between the Association and your officials, on the subject of wilderness parks in Northern Canada. The Association supports in principle the establishment of wilderness parks. It also believes, however, that important judgements dealing with land classification should be made in light of all factors, interests and concerns. The Association is therefore concerned that it has not yet had an opportunity to contribute its knowledge and experience to the policy formulation process.

The Canadian Petroleum Association represents approximately 200 companies involved in the exploration, production and pipeline activities of the petroleum industry. Its members are responsible for approximately 85% of all oil and gas production in Canada, and represent the major effort of the petroleum industry in exploring for oil and gas in the frontier regions of Canada. The oil industry has been involved in the north for some time, the first Arctic Islands Well having been drilled in 1961. This operation was preceded by extensive exploration and drilling which occurred as early as the 1920's in the Mackenzie River area. In view of these circumstances, the CPA feels it has sound reason and precedent for presenting its viewpoint to government on this occasion.

Members of the Association have developed experience in the matter of land use planning over the years, and would like to contribute this knowledge to the governmental planning process. The petroleum industry has perhaps some of the most definitive information available on both the environmental and human history within many of the proposed parks, and we believe that decisions about these parks would benefit from this information. In addition, the petroleum industry has been a leader in developing expertise in dealing with the multiple use concept of land use planning in various geographic and climatic zones. The objectives which result in a decision to establish a park may be more equitably and effectively met by the establishment and enforcement of a multiple-use land management program.

In view of the foregoing, the Association wishes to ensure, in the interest of all Canadians, that there will be in-depth consultation between the petroleum industry and government prior to any decisions concerning the classification of certain lands for parks. Notwithstanding that the wilderness park proposals are still in the conceptual stage we believe that such consultations should occur at an early date and certainly before the principles and policies governing the establishment of the parks have become fixed.

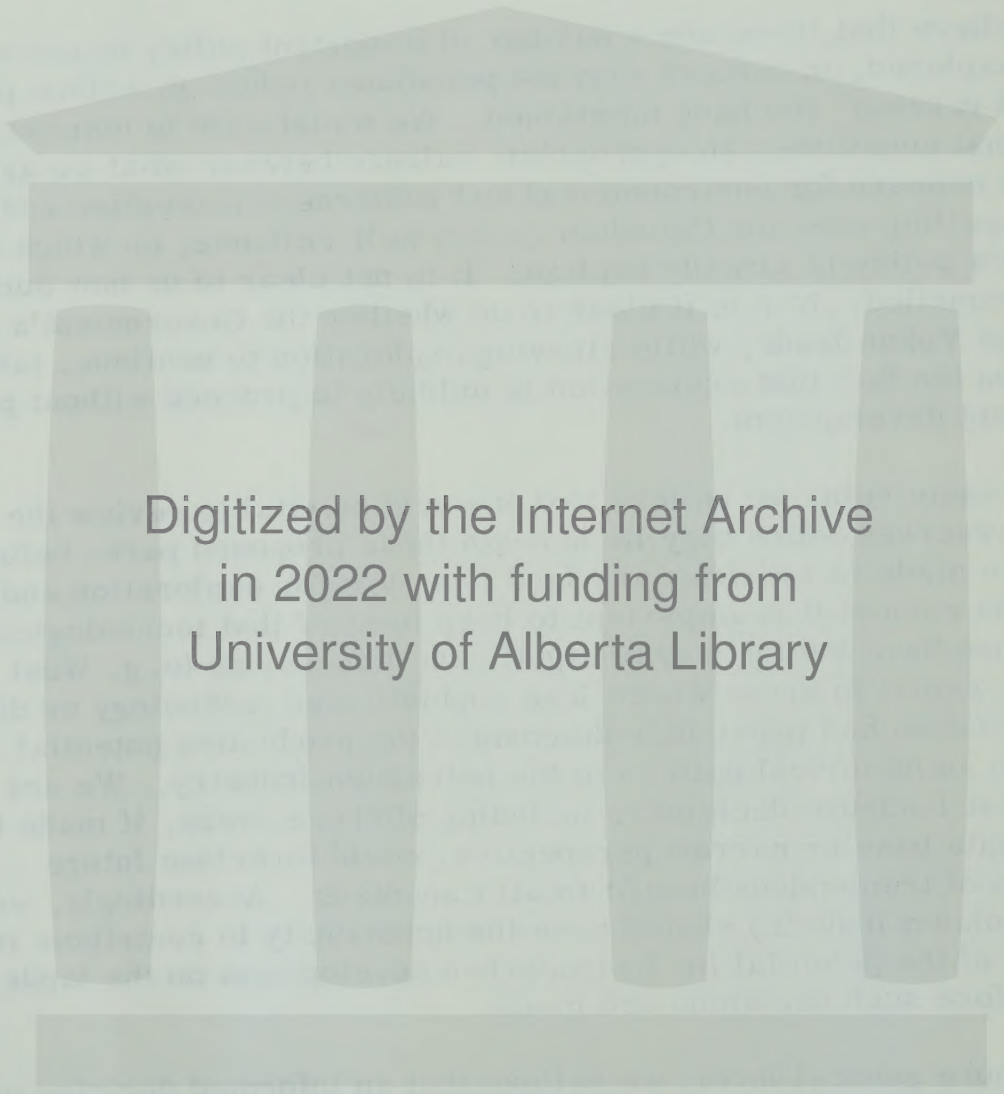
With specific reference to the matter of releasing land for development we welcome your statement in Banff (Oct. 9, 1978) that "all interests will be consulted and all reasonable accommodations will be made". We have also noted, however, your reference to discussions already under way between

your officials and "the mining industry on, among other things, a land-use rationale for the north ....". It is a matter of concern to us that no such dialogue has yet opened up between your officials and the Canadian Petroleum Association, which, as indicated earlier, represents the great majority of the petroleum industry in Canada. Our concerns have been sharpened somewhat by your declared intention to recommend a final version of Parks policy to Cabinet early in 1979.

We believe that there are a number of important policy issues which need to be explored, in concert with the petroleum industry, before preparation of the "final version" you have mentioned. We would wish to discuss, for example, what constitutes an appropriate balance between what we agree is a legitimate concern for environmental and wilderness protection and the equally compelling need for Canadian energy self-reliance, on which the Government's policy is already explicit. It is not clear to us how such policies might be reconciled. Nor is it clear to us whether the Government's announced withdrawal of Yukon lands, while allowing exploration to continue, takes into consideration the fact that exploration is unlikely to proceed without provision for subsequent development.

In the same vein, we believe that it would be vital to review the potential oil and gas reserves which may lie beneath these proposed parks before decisions are made to withdraw any land from use for exploration and development. In this context it is important to keep in mind that technological change and experience have led the way to significant discoveries (e.g. West Pembina, Rainbow, or Zama) in areas where less sophisticated technology or differing data interpretation had previously discounted the productive potential. Indeed, this has been an historical pattern in the petroleum industry. We are therefore concerned that land-use decisions, including offshore areas, if made from an incomplete data base or narrow perspective, could foreclose future opportunities of tremendous benefit to all Canadians. Accordingly, we believe that the petroleum industry should have the opportunity to contribute its unique appreciation of the potential for hydrocarbon development on the lands in question, before such decisions are made.

On a more general level, we believe that an informed decision on the creation of wilderness parks would benefit from discussion of the concept of "wilderness" itself. The ultimate definition of a "wilderness area" certainly excludes from that area any activity or process not found in nature and even calls for the strict regulation of human visitation. The Parks Canada interpretation of "wilderness" is obviously not so restrictive, since the parks which have been proposed in northern Canada already include, or will provide for, such activities as the continuation of hunting by native people, and the continued operation of the Distant Early Warning System, in the case of the northern Yukon.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This modification of the concept of "pure" wilderness should open up for consideration the question of whether and how, sensitive and intelligent land use by the petroleum industry might be carried on without prejudice to the need to preserve and protect ecosystems and areas of natural beauty. This concept is not in conflict with our own industry's objectives and there is ample precedent in other regions of North America where it has been demonstrated that the objectives of a park can accommodate certain forms of controlled industrial activity. (Some of these are detailed in Appendix A.)

We would like to enter into discussions with your officials on these and other matters, in a genuine spirit of co-operation aimed at sharing our knowledge and experience with them. Our industry believes that multiple use of certain land areas, under controlled conditions, can be carried on without any long term harm to natural value and within acceptable limits in the short run. Notwithstanding the often emotional atmosphere which surrounds the issue of environmental protection, we believe that there are matters of practical significance to Canada's future energy requirements which also have to be taken into account. Above all, we believe that these competing needs can be reconciled for the benefit of Canadians, whether as environmentalists or as consumers of energy. We seek your assurance that an opportunity will exist for a full and meaningful exchange of views with your officials on these matters before the policy lines are finally drawn.

APPENDIX A

The concept of "wilderness", although undefined, has not in practice eliminated industrial activity from ecologically sensitive areas. In northern Canada seismic operations were successfully carried out in northern Banks Island where substantial herds of Musk Ox and Cariboo exist.

Although the ecosystems in northern and southern Canada are different, experience has indicated that the problem of protecting them is no more difficult to solve in the north than in the south. Therefore, we feel justified in paralleling southern examples which illustrate that industrial activity and park values are not always mutually exclusive of one another.

The Trans Mountain pipeline is routed through Jasper Park, and, while the right-of-way is visible in some locations, it would be difficult to prove that the pipeline has significantly detracted from the scenic value of the park. Ecologically, there is no evidence that we are aware of that would indicate that the construction or operation of the pipeline has had a significant impact on the wildlife populations within the park. Similarly, in Wood Buffalo National Park, industrial operations, as well as hunting, have occurred in the past, and to some extent are still occurring. Obviously, under certain controlled and closely managed circumstances, activities of the above nature are deemed important enough, and not out of context with the basic objective of the park.

Other examples of industry co-existing with parks include the Province of British Columbia and the Province of Quebec, which have developed land use planning schemes in their provincial parks in order to allow industrial activity in certain zones within park boundaries. The Wells Grey Park in B.C. has had logging activity in certain portions of it in the past which have been conducted in a manner acceptable to park management. In the Gaspe Provincial Park in Quebec, an operating mine has been developed.

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